K. Chad Burgess
 Director & Deputy General Counsel
 Dominion Energy Southeast Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033 DominionEnergy.com



December 27, 2019

# VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29211

Re:

Exploration of a South Carolina Competitive Procurement Program for the Competitive Procurement of Energy and Capacity from Solar and Other Renewable Energy Facilities by an Electrical Utility as Allowed by South Carolina Code Section 58-41-20(E)(2)

Docket No. 2019-365-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC") is a Petition to Intervene in the above-referenced docket.

By copy of this letter DESC is providing a copy of the Petition to Intervene to the parties of record and encloses a certificate of service to that effect.

If you have any questions, please advise.

Very truly yours,

K. Chad Burgess

KCB/kms Enclosures

cc:

Andrew Bateman, Esquire Becky Dover, Esquire Carri Grube Lybarker, Esquire James Goldin, Esquire Rebecca J. Dulin, Esquire Christopher Huber, Esquire Frank R. Ellerbe III, Esquire Heather Shirley Smith, Esquire Katie M. Brown, Esquire Richard L. Whitt, Esquire

(all via electronic mail and U.S. First Class Mail w/enclosures)

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

### **DOCKET NO. 2019-365-E**

IN RE:

Exploration of a South Carolina Competitive Procurement Program For the Competitive Procurement of Energy and Capacity from Solar and Other Renewable Energy Facilities by South Carolina Code Section 58-41-20(E)(2)

PETITION TO INTERVENE OF DOMINION ENERGY SOUTH CAROLINA, INC.

Dominion Energy South Carolina, Inc. ("DESC" or "Company") hereby files with the Public Service Commission of South Carolina ("Commission") this Petition, pursuant to S.C. Code Ann. Reg. 103-825 (2012), and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding.

In support of this Petition, DESC respectfully would show unto the Commission the following key facts and would request and petition the Commission for the following relief:

1. DESC is a corporation organized and existing under the laws of the State of South Carolina and is headquartered in Cayce, South Carolina. More specifically, DESC is a combination utility engaged in the generation, transmission, distribution, and sale of electricity to the public for compensation as well as the distribution and sale of natural gas to the public for compensation.

- 2. On November 26, 2019, the Public Service Commission of South Carolina ("Commission") opened Docket No. 2019-365-E in accordance with South Carolina's Energy Freedom Act ("The Act") to explore a South Carolina Competitive Procurement Program Allowable under S.C. Code Ann. § 58-41-20(E)(2).
- 3. DESC has a substantial and material interest in the subject matter of the above-captioned proceeding, in that the outcome of the proceeding will directly impact DESC. As a public utility, DESC is subject to the regulatory authority of the Commission pursuant to Title 58 of the Code of Laws of South Carolina. DESC's interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, DESC submits that good cause exists for the Commission to allow the Company to participate as a party in the above-captioned proceeding.
- 4. DESC has not developed a final position in this matter, but reserves the right to modify, amend or expand any position the Company develops during the course of this proceeding, including any position espoused herein.

5. Corporate legal counsel for DESC in this proceeding are as follows:

K. Chad Burgess, Esquire Director & Deputy General Counsel Dominion Energy South Carolina, Inc. Mail Code C222 220 Operation Way Cayce, SC 29033-3701 Telephone: 803-217-8141

Telephone: 803-217-8143 Facsimile: 803-217-7810

kenneth.burgess@dominionenergy.com

Matthew W. Gissendanner, Esquire Assistant General Counsel Dominion Energy South Carolina, Inc. Mail Code C222 220 Operation Way Cayce, SC 29033-3701

Telephone: 803-217-5359 Facsimile: 803-217-7810

matthew.gissendanner@dominionenergy.com

All correspondence and any other matters relative to this proceeding should be addressed to DESC's authorized representatives as stated hereinabove.

WHEREFORE, having set forth its Petition, DESC respectfully requests that the Commission issue an order (i) granting the Company's petition to intervene in this matter and participate fully in the Docket and any hearing to be scheduled in this matter, (ii) granting DESC all rights attendant to intervenor status, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and (iii) granting such other and further relief as is just and proper.

# [SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

Mail Code C222 220 Operation Way Cayce, SC 29033-3701

Telephone: 803-217-8141 (KCB) Telephone: 803-217-5359 (MWG)

Facsimile: 803-217-7931

kenneth.burgess@dominionenergy.com

matthew.gissendanner@dominionenergy.com

Attorneys for Dominion Energy South Carolina, Inc.

Cayce, South Carolina

December 27, 2019

### **BEFORE**

### THE PUBLIC SERVICE COMMISSION

OF

#### SOUTH CAROLINA

#### DOCKET NO. 2019-365-E

IN RE:

This is the certify that I have caused to be served this day one (1) copy of Dominion Energy South Carolina, Inc.'s **Petition to Intervene** via electronic mail and U.S. Mail to the persons named below at the addresses listed:

Andrew M. Bateman, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 abateman@ors.sc.gov

Christopher Huber, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29801 <u>chuber@ors.sc.gov</u> Frank R. Ellerbe III, Esquire Robinson Gray Stepp & Laffitte, LLC 1310 Gadsden Street Columbia, SC 29201 fellerbe@robinsongray.com

Heather Shirley Smith, Esquire Duke Energy Carolinas, LLC 40 W. Broad Street, Suite 690 Greenville, SC 29601 heather.smith@duke-energy.com

James Goldin, Esquire
Nelson Mullins Riley & Scarborough LLP
1320 Main Street 17th Floor
Columbia, SC 29210
jamey.goldin@nelsonmullins.com

Katie M. Brown, Esquire
Duke Energy Progress, LLC
40 West Broad Street, Suite 690
Greenville, SC 29601
Katie.Brown2@duke-energy.com

Rebecca J. Dulin, Esquire Duke Energy Carolinas, LLC 1201 Main Street, Suite 1180 Columbia, SC 29201 Rebecca.Dulin@duke-energy.com

Richard L. Whitt, Esquire Whitt Law Firm, LLC Post Office Box 362 Irmo, SC 29063 richard@rlwhitt.law

Becky Dover, Esquire
SC Department of Consumer Affairs
PO Box 5757
Columbia, SC 29250
bdover@scconsumer.gov

# Carri Grube Lybarker, Esquire SC Department of Consumer Affairs PO Box 5757 Columbia, SC 29250

clybarker@scconsumer.gov

Karen M. Scruggs

Cayce, South Carolina

This Uday of December, 2019